

From: [Jennifer Gaines](#)
To: Gaines.jennifer@epa.gov
Subject: Fw: Mitigation - Liquid Concentrate
Date: 05/29/2012 12:28 PM

Jennifer Gaines
Wildlife Biologist
U.S. Environmental Protection Agency
Insecticide-Rodenticide Branch
Registration Division (7505P)

Tel: 703 305-5967
Fax: 703 305-6309

----- Forwarded by Jennifer Gaines/DC/USEPA/US on 05/29/2012 12:24 PM -----

From: Russell Wasem/DC/USEPA/US
To: "John Lublinkhof" <jlublinkhof@belllabs.com>
Cc: Laura Parsons/DC/USEPA/US@EPA, John Hebert/DC/USEPA/US@EPA, Jennifer Gaines/DC/USEPA/US@EPA
Date: 10/23/2008 10:51 AM
Subject: Re: Mitigation - Liquid Concentrate

Good Morning John,

We have discussed your request for clarification on how the mitigation measures apply to concentrate rodenticide products.

Since the product in question (12455-61) is a concentrate, we will permit this product to be sold in sizes that are equivalent to 4lbs of ready-to-use dry bait product. This 4lb equivalent will be required for all 1st generation anticoagulant concentrate products, with an 8lb equivalent being required for 2nd generation anticoagulant concentrate products.

Using this equivalent, 12455-61 must be sold in packages containing no fewer than 8 - 1.68fl oz pouches. We calculate that since the minimum rat placement for liquid baits is 16oz of liquid (= 1/2 package), the minimum package size for the concentrate must be 16X of 1/2 package or 8 packages or 13.44oz (1.68oz x 8 packages).

Please let me know if you have any further questions. Also, our correspondence on this matter will be added to the docket. Please let me know if you have any objections.

Regards,

Rusty_____

Rusty Wasem
Chemical Review Manager

Reregistration Branch I
Special Review & Reregistration Division
(703)305-6979

▼ "John Lublinkhof" <jlublinkhof@belllabs.com>

"John Lublinkhof"
<jlublinkhof@belllabs.com>

To Russell Wasem/DC/USEPA/US@EPA
cc

09/30/2008 03:52 PM

Subject Mitigation - Liquid Concentrate

Dear Rusty,

Good Afternoon.

We have submitted amendment requests to the Registration Division for all but one of our products to comply with the final mitigation decision. The one remaining product I am struggling with is Liquatox II (EPA Reg. No. 12455-61) which is a liquid concentrate of sodium salt of diphacinone).

I refer to the table on page 36 of the final mitigation decision. We understand the restrictions (not to be used in human residences, indoor use only etc.) However, the 4 lb. minimum size requirement is not practical. Currently, professionals and farmers are able to purchase 1.68 oz. pouches individually (each is mixed with a quart of water) to use in special situations, namely grain elevators and food storage facilities etc. In these types of sites, food is readily available and rats and mice are not easily attracted to solid baits. The use of a liquid is ideal in such situations since since rats and mice are very attracted to such for their water needs especially in these dry environments. A 4 lb. size requirement equates to approximately 37 pouches. This is a very undesirable size when the individual pouches are not allowed for individual sale. A acceptable and desirable size would be a package of 6 to 8 pouches.

Is there a way possible that the minimum size requirement can be changed to allow continued sale and use of this important specialized product? Please advise. I am looking forward to your input and suggestions.

Thanks,

John Lublinkhof, Ph.D,
Director of Regulatory Affairs
Bell Laboratories, Inc.
608-241-0202 Ext. 3138